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June 4, 2021

VIA ECF

Honorable Lorna G. Schofield, U.S.D.J.
United States District Court for the Southern District of New York
40 Foley Square
New York, NY 10007

Re: Gonzalez et al v. Healthy Market Place Corp. et al., 1:21-cv-03317-LGS

Your Honor:

This office represents the Plaintiff in the above referenced matter. I write, together with Defendants' Counsel, to respectfully request an adjournment of the initial conference currently scheduled for June 10, 2021 at 10:30 A.M. (ECF Doc. No. 25), and an extension of the deadline to file a status letter and proposed case management plan by June 7, 2021 (ECF Doc. No. 36). This is the parties' first request for an adjournment and extension.

First of all, the parties would like to apologize for not submitting the joint status letter and proposed case management plan on June 3, 2021. Defendants' counsel filed a notice of appearance on that same date and today the parties filed a stipulation agreeing to extend Defendants' time to answer the complaint until July 4, 2021 (ECF Doc. No. 35). The parties believe it would be more fruitful to hold the initial conference until after the Defendants have filed an answer to the complaint. This would also give time for the parties to confer prior to the scheduled conference to agree upon a proposed discovery plan.

In light of the above, we respectfully request that the initial conference be adjourned until late early to mid-July. At this time, there are no further conferences or deadlines scheduled in this matter.

We thank the Court for its time and attention to this matter.

Respectfully submitted,

/s/ Catalina Sojo
Catalina Sojo, Esq.
MICHAEL FAILLACE & ASSOCIATES, P.C.
Attorneys for Plaintiff

The application is **GRANTED**. The Court does not typically adjourn the initial conference pending the filing of an answer or other response to the Complaint. Nevertheless, the initial conference on June 10, 2021, at 10:30 A.M. is hereby adjourned to **July 15, 2021, at 10:30 A.M.** The parties shall call (888) 363-4749 and use Access Code 558-3333. The time of the conference is approximate, but the parties shall be ready to proceed at that time. By **July 8, 2021**, the parties shall file the joint letter and proposed CMP.

SO ORDERED.

Dated: June 7, 2021
New York, New York


LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE